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## CENTRALINA COUNCIL OF GOVERNMENTS

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May 27, 1993

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MAY 28 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M Street, NW Room 222  
Washington, DC 20554

RECEIVED

MAY 28 1993

Re: PR Docket Number 92-235

FCC MAIL ROOM

Dear Ms. Searcy:

Thank you for the opportunity to comment on the proposed refarming of frequencies in the spectrum below 512 MHz.

The enclosed resolution was adopted by the Region F Emergency Medical Services Advisory Council, representing over fifty providers of emergency medical services in the eight-county Centralina region.

Our Council has been concerned for a number of years with the improvement of emergency medical communications, and has worked diligently toward upgrading both equipment and operational practices. While we recognize the need to create additional frequencies in the public safety spectrum, we also see that the implementation date proposed by the Commission will present significant hardships to our EMS providers, both governmental and volunteer. The rules, as proposed, could require the replacement of equipment twice in a ten year period.

We encourage the Commission to reconsider both the time frame and the proposed reduction of bandwidth beyond the 15 or 12.5 kHz point.

Respectfully submitted,

*F. Wayne Ashworth*

F. Wayne Ashworth,  
Chairman, Region F EMS Advisory Council

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MAY 28 1993

RESOLUTION

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

IN THE MATTER OF

MAY 28 1993

FCC NOTICE OF PROPOSED RULE-MAKING 92-235

FCC MAIL BRANCH

**WHEREAS**, emergency medical services agencies are major users of two-way land mobile radio equipment; and

**WHEREAS**, emergency medical services agencies deal in the protection of the lives and well-being of the residents of this land, and cannot function without reliable two-way radio communications, therefore becoming priority users of radio frequencies; and

**WHEREAS**, NPRM Docket 92-235 will result in the creation of additional frequencies and increased efficiency in land mobile radio communications, increasing their reliability in the long term; and

**WHEREAS**, NPRM Docket 92-235, through its reduction in antenna height and effective radiated power provisions, will require the addition of numerous antenna sites for public safety use to achieve acceptable coverage; and

**WHEREAS**, virtually none of the UHF or VHF equipment in use in this region is adaptable to the narrower bandwidth requirements proposed by NPRM Docket 92-235 as of January 1, 1996, effectively requiring wholesale replacement of functional radio systems; and

**WHEREAS**, these changes will result in major local government expenditures in a very short time frame, with no offsetting provisions for grants or cost-sharing; and

**WHEREAS**, many of the providers of emergency medical services are volunteers who purchase their own two-way radio equipment as individuals, or through community fund-raising events, and in this area have recently upgraded their communications capabilities;

**NOW THEREFORE, BE IT RESOLVED** that the Region F Emergency Medical Services Advisory Council goes on record as supporting the intent of NPRM Docket 92-235; and

**BE IT FURTHER RESOLVED** that the Council opposes the January 1, 1996 effective date of NPRM Docket 92-235, and recommends instead that a time frame be adopted which permits phasing in of narrow-bandwidth equipment as existing systems age out; and

**BE IT FURTHER RESOLVED** that the Council encourages the Commission to delay

adoption of the second-tier bandwidth reductions (to 5 kHz and 6.25 kHz) indefinitely.